

IN THE UNITED STATES BANKRUPTCY COURT  
District of Puerto Rico

In the Matter of:

MARIAM ROSADO ROMAN

Debtor(s)

Case No. 13-02106 BKT

Chapter 13

OPPOSITION TO MOTION OF DORAL BANK  
FOR RELIEF FROM AUTOMATIC STAY

TO THE HONORABLE COURT:

The undersigned, attorney for the above-named debtor, notifies the Court as follows,

1. Paragraphs 1 through 4 are admitted. It is also admitted that the liens averred are presently recorded. All of the remaining factual allegations are denied as stated in the motion.
2. Debtor payments to Doral for the months of May and June. Her payment for the month of July was rejected causing that she appeared with an additional month in arrear. As addendum to the motion there is evidence of the months which payment were accepted. Because this case was filed on 3/19/2013 and motion requesting relief of stay was filed on July 18, 2013 the declarations about arrears at that time and in the amount stated were not correct.
3. We already discussed the situation with Doral's attorney in order to have the payments properly credited and mail the one corresponding to the month of July and month of August will be paid the 15 of present month.

**WHEREFORE**, we respectfully request from this Honorable Court to take notice of the informed above and deny motion requesting relief of stay.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY**, that on this same date a true and exact copy of the foregoing has been field with the Clerk of the Court that will notified to the Chapter 13 Trustee José R. Carrión Morales, attorney Rosamar García Fontan, Esq. For Doral Bank and all other appearing parties, using the Court's CM/ECF system.

In Vega Baja, Puerto Rico, on this August 3, 2013

s/ Juan O. Calderon Lithgow

**JUAN O. CALDERON LITHGOW**

ATTORNEY FOR DEBTOR, 205607

APARTADO 1710

VEGA BAJA, PR 00694-1710

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1304581  
DORAL BANK  
San Juan, Puerto Rico  
JUN 13 2013  
TELLER

DORAL BANK  
San Juan, Puerto Rico  
JUN 13 2013  
TELLER

HIPOTECA NUM. / LOAN NUMBER  
1304581  
FECHA DE VENCIMIENTO  
DUE DATE  
PAGO MENSUAL  
MONTHLY PAYMENT  
\$270.60

**doralbank**  
PO BOX 71529  
SAN JUAN PR 00936-8629  
MARIAM ROSADO ROMAN  
\*Incluya su número de préstamo en su cheque o giro.  
Miembro FDIC  
OCF Lic. B-34

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CUPON DE PAGO  
PAYMENT COUPON